



Swan View Coalition

"People Helping People Help the Earth"

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November 28, 2005

Dept. of Natural Resources and Conservation
2705 Spurgin Road
Missoula, MT 59804-3199
✓ Attn: Mike O'Herron and Sarah Pierce

U.S. Fish and Wildlife Service
2705 Spurgin Road
Missoula MT 59804-3199
Attn: Lowell Whitney

U.S. Fish and Wildlife Service
780 Creston Hatchery Road
Kalispell, MT 59901
Attn: Tim Bodurtha

Dear Mike, Sara, Lowell and Tim:

We have looked over DNRC's draft conservation strategies for aquatic species, grizzly bear, lynx and transition lands. We have also reviewed the November 23, 2005 comments submitted by Friends of the Wild Swan in this matter. We concur with the comments and concerns submitted by Friends of the Wild Swan and, rather than repeat them here, we adopt them in whole by reference.

Moreover, we provide the following findings by Fish and Wildlife Service to provide further evidence DNRC has erred in citing Weilgus et al 2002 to suggest "there is little support for the hypothesis that unused road or roads used only for forestry operations displace grizzly bears." In its December 23, 2004 Biological Opinion on the Effects of the West Side Reservoir Post-Fire Project, FWS finds bears "learn to avoid the disturbance and annoyance generated by roads. Such animals may not change this resultant behavior for long periods after road closures and lack of negative reinforcement. Even occasional human-related vehicle noise can result in annoying grizzly bears to the extent that they continue to avoid roads."

Sincerely,

Keith J. Hammer
Chair